

Philips Healthcare

October 4, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: TerreStar Corporation Request for Temporary Waiver of Substantial
Service Requirement, WT Docket No. 16-290

Dear Ms. Dortch:

Philips Healthcare (Philips) welcomes FCC consideration of the above-captioned Request for Temporary Waiver submitted by the TerreStar Corporation (TerreStar) and urges its grant.¹ Commission grant of this waiver is very much in the public interest because it would result in critically-needed health benefits being made available to patients through expansion of Wireless Medical Telemetry Service (WMTS) services and capabilities.

Philips is the world leader in patient monitoring equipment and the largest provider of 1.4 GHz WMTS equipment to healthcare facilities in the United States. Philips has discussed with TerreStar utilizing the subject spectrum on a long-term basis to provide needed WMTS services and capabilities. Grant of the waiver will enable the provision of expanded capabilities that otherwise will remain foreclosed. These will result in critical benefits for patients throughout the country.

Hospitals and medical providers increasingly rely on twenty-first century information and communications technologies. WMTS is an important tool to improve health care. Wireless monitoring enables health care providers to recognize patterns and respond more rapidly to changes in their patients' conditions. These improved capabilities noticeably improve the quality of patients' experiences and outcomes.

Demand for WMTS remote patient monitoring is increasing, requiring more spectrum to provide the needed service and capabilities. This issue has become more urgent as interference threats to medical telemetry have emerged in the dedicated 600 MHz WMTS spectrum at the same that the unlicensed ISM spectrum has become more crowded.²

¹ FCC Public Notice DA 16-1029 (released Sept. 14, 2016).

² Philips addressed the need for additional spectrum in WP Docket 07-100. *See*, for example, Philips Healthcare's Comments in response to the Second Further Notice in that proceeding, dated May 14, 2010. The need expressed therein is even more critical now.

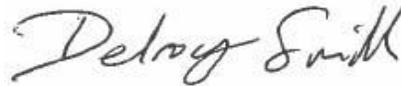
The Commission's grant of TerreStar's request for a temporary waiver will address the need for additional WMTS spectrum in a realistic and timely fashion. The waiver and TerreStar's work would significantly increase the supply of spectrum for 1.4 GHz medical telemetry and allow a substantial expansion of WMTS capacity that today is foreclosed by spectrum restraints. Grant of TerreStar's request also would permit research and development of innovative medical telemetry applications outside of health care facilities.

Pursuant to discussions with TerreStar, we are confident that providers of WMTS at 1.4 GHz will have the opportunity to utilize TerreStar's spectrum at 1390-1395 MHz and 1432-1435 MHz following grant of the waiver request. We note with approval that TerreStar's planned framework includes registration and frequency coordination similar to that used for WMTS. This will make expansion of WMTS capacity and capabilities as seamless as possible for hospitals and other healthcare providers.

Philips appreciates TerreStar's interest in protecting WMTS from interference and enhancing wireless medical telemetry capabilities in response to growing health care needs. We agree with TerreStar that development of WMTS in its licensed spectrum likely will take three years, as TerreStar, equipment manufacturers, and health care providers work through a number of complex processes that must be completed to realize this deployment. We also appreciate the long term thinking from TerreStar to jointly develop the spectrum regulatory processes to help optimize long term utilization for both TerreStar and WMTS customers.

Accordingly, we urge the Commission to grant TerreStar's request for a three-year temporary waiver of its substantial service requirement.

Respectfully submitted,



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